City of Seattle

Gregory J. Nickels, Mayor
Department of Design, Construction and Land Use
D. M. Sugimura, Director

CITY OF SEATTLE
ANALYSIS AND DECISION OF THE DIRECTOR OF
THE DEPARTMENT OF DESIGN, CONSTRUCTION AND LAND USE

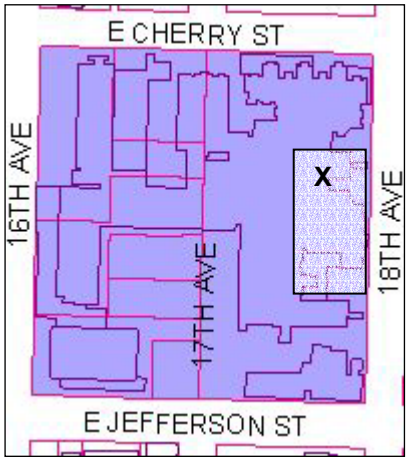
Application Numbers: 2206206

Applicant Name: Mike Scott of Callison for 17th and James LLC

Address of Proposal: 500 – 17th Ave

SUMMARY OF PROPOSED ACTION

Master Use Permit to establish use for future construction of a 156,836 square foot addition to the existing 1910 building at Swedish/Providence Hospital. The project will include the demolition of a portion of the existing 1910 Building. Following demolition, a 6 story addition will be constructed. The proposed addition is located on 18th Avenue between Cherry and Jefferson Streets. The addition will be designed to house medical offices, research and clinical labs, certain inpatient functions and related administrative offices for Swedish/Providence Hospital. Parking for this addition will be provided as permitted with the underlying Major Institution Master Plan, adopted by the City Council in July, 1994.



SEPA DETERMINATION: [ ] Exempt [ ] DNS [ ] MDNS [X] EIS

[ ] DNS with conditions

[ ] DNS involving non-exempt grading, or demolition, or involving another agency with jurisdiction

BACKGROUND

Site and Vicinity

The proposed addition is located within the Swedish/Providence main campus. The campus and Master Plan area encompass an approximately 10 block area bounded by E Cherry, E Jefferson, 15th Ave and mid block between 18th and 19th Avenues. The proposed addition for this project is located on the east side of the campus, facing 18th Avenue between E Cherry and E Jefferson Street. The site is zoned with a Major Institution Overlay with a 105 foot height limit for buildings developed by the Institution within this overlay. The underlying zoning is Lowrise 3, applicable only to those projects not developed by the Institution. Properties to the east and south immediately outside of the Master Plan boundaries are zoned SF 500, accommodating single family residences. Properties to the north of the proposed addition are zoned Lowrise 3, accommodating both single family and multifamily uses.

Proposal

The proposed development would include approximately 158,836 square feet of development distributed on a total of 7 floors. To accommodate this, approximately 65,390 square feet of the existing 1910 Building would be demolished. The 1910 Building is the primary historic structure at the Swedish/Providence campus, marked by a large bell tower that serves as a landmark for Central Seattle. The portions of the building to be demolished currently houses ancillary function of the hospital, primarily storage spaces and some administrative offices. Following demolition, the new addition will be constructed with a basement, followed by 6 floors of above grade structure. Also included will be a small mechanical and stair penthouse with all rooftop mechanical equipment screened.

The proposed addition was originally intended to be redeveloped for a Skilled Nursing Facility, as indicated in the September, 1994 Major Institution Master Plan, or MIMP. This facility was designed to accommodate approximately 60,000 square feet of new floor area. The revisions that are proposed under this development were reviewed by DCLU staff to determine if they comply with requirements under SMC 23.69.035 for Changes to Master Plan. Based on the proposed revisions for this facility against what was originally permitted for this site, a determination of whether an amendment to the Master Plan for the development is required. All projects in the MIMP are allowed to have increases in structure size for existing structure as well as structures not yet completed. These exemptions, detailed in SMC 23.69.035B, allow for a structure to be increased in size without requiring an amendment. At an overall increase in size of 91,448 sq feet of the 1910 Building due to this addition, the project is exempt from the amendment process detailed in this code section.

The 1910 Building was designated as a City of Seattle Landmark by the Landmark Preservation Board. The designation, approved on February 4, 2003, designated both the main 1910 building as well as an addition on the south side of this building built in the 1920's as a solarium, as City of Seattle Landmarks. The proposed demolition and new addition will require the issuance of a Certificate of Approval from the Landmarks Preservation Board, as required under SMC 25.12.

Parking for the project will be provided under the terms of the Major Institution Master Plan adopted by the City Council in July, 1994, which provided minimum and maximum parking numbers for the campus to address both required parking for the mix of uses and to avoid spillover parking in the surrounding neighborhood. The blocks surrounding the proposed addition that are not part of the campus are marked with one and two story single family residences. Other higher density multifamily structures are also located in the area, with structures of up to 4 stories in height.

ANALYSIS – STATE ENVIRONMENTAL POLICY ACT (SEPA)

This analysis relies on the Final Environmental Impact Statement for the Providence Major Institution Master Plan, published July, 1992, its Addendum for this project dated May 6, 2003, the initial SEPA checklist dated October 17, 2002, as well as the technical environmental reports, comments and responses submitted with respect to those documents. This decision also makes reference to and incorporates the project plans submitted with the project application on October 17, 2002 and revised several times thereafter.

The Seattle SEPA Ordinance provides authority to require mitigation of adverse impacts resulting from a proposed project (SMC 25.05.655 and 25.06.660). Mitigation, when required, must be related to specific environmental impacts identified in an environmental document and may be imposed to the extent that a given impact is attributable to the proposal, and to the extent that the mitigation is reasonable and capable of being accomplished. Additionally, mitigation may be required only when based on policies, plans and regulations as enunciated in SMC 25.05.665 to SMC 25.05.675 inclusive (SEPA Overview Policy, SEPA Cumulative Impacts Policy, SEPA Specific Environmental Policies). In some instances, local, state or federal regulatory requirements will provide sufficient mitigation of an impact and additional mitigation imposed through SEPA not be necessary.

The SEPA Overview Policy (SMC 25.05.665) clarifies the relationship between codes, policies and environmental review. Specific policies for each element of the environment, certain neighborhood plans, and other policies explicitly referenced may serve as the basis for exercising substantive SEPA authority. The Overview Policy states in pertinent part that "where City regulations have been adopted to address an environmental impact, it shall be presumed that such regulations are adequate to achieve sufficient mitigation." Under specific circumstances, mitigation may be required even when the Overview Policy is applicable. SMC 25.05.665(D).

ENVIRONMENTAL IMPACTS

The original MIMP required the development of an EIS to evaluate the impacts of that Plan. The FEIS considered the following environmental impacts: Air; Energy and Natural Resources; Environmental Health and Noise; Land Use; Housing; Light and Glare; Aesthetics; Cultural/Historic Resources; Transportation, and Public Services, Circulation and Parking. Since the FEIS only considered impacts of a building at this location that was smaller in size than the current project, an Addendum to the EIS was required. The Addendum to the project covered the following elements, based upon the increases in square feet and height:

Transportation; Aesthetics; Noise; Public Services; Historic Resources. No other elements of the original EIS are the subject of the Addendum, due to the size and scope of the project. The Addendum was accepted by the department on May 6, 2003, with the notice of adoption and availability of addendum distributed to individuals and agencies that commented on the underlying FEIS, as well as individual who received notice of this project, on May 29, 2003. No appeal period on the acceptance of this Addendum in required, per SMC 25.05 and SMC 23.76.

The information provided by the applicant and its consultants, the public comments received, and the experience of the lead agency with the review of similar proposals form the basis for review and conditioning of the proposal. The potential environmental impacts disclosed by the Draft and Final EIS are discussed below. Where appropriate, mitigation may be required pursuant to Seattle's SEPA Ordinance (SMC 25.05).

Short-Term Impacts

Demolition and construction activities could result in the following temporary or construction-related adverse impacts:

- construction dust and storm water runoff;
- erosion;
- increased traffic and demand for parking from construction equipment and personnel;
- increased noise levels;
- occasional disruption of adjacent vehicular and pedestrian traffic;
- decreased air quality due to suspended particulates from building activities and hydrocarbon emissions from construction vehicles and equipment;
- increased noise; and
- consumption of renewable and non-renewable resources.

Several adopted codes and/or ordinances provide mitigation for some of the identified impacts: The Noise Ordinance, the Stormwater Grading and Drainage Control Code, the Street Use Ordinance, and the Building Code. The Stormwater, Grading and Drainage Control Code regulates site excavation for foundation purposes and requires that soil erosion control techniques be initiated for the duration of construction. The Street Use Ordinance requires debris to be removed from the street right-of-way, and regulates obstruction of the pedestrian right-of-way. Puget Sound Clean Air Agency regulations require control of fugitive dust to protect air quality. The Building Code provides for construction measures in general. Finally, the Noise Ordinance regulates the time and amount of construction noise that is permitted in the City. Compliance with these applicable codes and ordinances will reduce or eliminate most short-term impacts to the environment.

Any conditions to be enforced during construction shall be posted at each street abutting the site in a location on the property line that is visible and accessible to the public and to construction personnel from the street right-of-way. The conditions shall be affixed to placards prepared by

DCLU. The placards will be issued along with the building permit set of plans. The placards shall be laminated with clear plastic or other waterproofing material and shall remain posted on-site for the duration of construction.

Construction Parking

Construction of the project is proposed to last for several months. Concerns were raised by residents through the review process concerning the effect of construction related traffic impacts on adjacent streets. On-street parking in the vicinity is limited, and the demand for parking by construction workers during construction could exacerbate the demand for on-street parking and result in an adverse impact on surrounding properties. The owner and/or responsible party shall assure that construction vehicles and equipment are parked on the subject site for the term of construction whenever possible. It is expected that all workers will be able to park on-site and for the remaining duration of construction activity. To further facilitate this effort, the owner and/or responsible party shall submit a construction phase transportation plan. These conditions will be posted at the construction site for the duration of construction activity. The authority to impose this condition is found in Section 25.05.675B2g of the Seattle SEPA ordinance.

Noise

In addition to the Noise Ordinance requirements, to reduce the noise impact of construction on nearby properties, all other construction activities shall be limited to non-holiday weekdays between 7:30 a.m. and 6:00 p.m. In addition to the Noise Ordinance requirements, to reduce the noise impact of construction on nearby residences, only low noise impact work such as that listed below, shall be permitted on Saturdays from 9:00 a.m. to 5:00 p.m. and on Sundays from 10:00 a.m. to 5:00 p.m.:

1. Surveying and layout;

2. Other ancillary tasks to construction activities will include site security, surveillance, monitoring, and maintenance of weather protecting, water dams and heating equipment.

After each floor of the building is enclosed with exterior walls and windows, interior construction on the individual enclosed floors can be done at other times in accordance with the Noise Ordinance. Such construction activities will have a minimal impact on adjacent uses. Restricting the ability to conduct these tasks would extend the construction schedule, thus the duration of associated noise impacts. DCLU recognizes that there may be occasions when critical construction activities could be performed in the evenings and on weekends, which are of an emergency nature or related to issues of safety, or which could substantially shorten the total construction time frame if conducted during these hours.

Therefore, the hours may be extended and/or specific types of construction activities may be permitted on a case-by-case basis by approval of the Land Use Planner prior to each occurrence. Periodic monitoring of work activity and noise levels will be conducted by DCLU Construction Inspections.

As conditioned, noise impacts to nearby uses are considered adequately mitigated.

Long-Term Impacts

The long-term impacts are typical of an office structure and will in part be mitigated by the City's adopted codes and/or ordinances. Specifically these include: Stormwater, Grading and Drainage Control Code (stormwater runoff from additional site coverage by impervious surface); Land Use Code; and the Seattle Energy Code (long-term energy consumption). Only those environmental impacts that may result in long-term impacts and may require mitigation measures beyond those provided in existing laws and regulations are discussed below.

Height, Bulk, and Scale

An analysis of the project identified potentially significant impacts resulting from Height, Bulk and Scale during the threshold determination review. These impacts are related primarily to the additional height bulk and scale directly attributable to this project, which was not evaluated in the underlying analysis in the FEIS. During the public review process, public comment expressed concerns with the perceived bulk and scale impacts, prompting the need for further review under authority provided in SMC 25.05.675G.

As required in the Major Institution Master Plan (MIMP), the development originally proposed for this site (Skilled Nursing Facility) was conditioned to require that the building include "façade articulation, detailing, materials, color, textures and other scale reducing devices…for example, detailed sills, belt courses, cornices…to compliment the adjacent building…". This condition can be reasonably assumed to require features that not only benefit the 1910 building, but also designed to provide design treatments to mitigate any perceived Height Bulk and Scale impacts of a project. Accordingly, these conditions are still applicable to the proposed addition, regardless of the use of the structure at the site.

As part of the May 6, 2003 addendum, a Massing Study showing photo simulations of the proposed project was developed. These photo simulations applied the rendering of the building, based upon the plans submitted for the project. The rendering included examples of the materials, massing and design details of the façade and was applied into photographs of the east façade of the 1910 building taken from off the project site on surrounding streets outside of the Major Institution overlay. As demonstrated in the photo simulations, some additional bulk and scale of the project may be perceived due to increase in floor area from the existing building. However, this additional bulk is not likely to cause any additional significant impacts than what current conditions demonstrate. Further, while the project does not provide the same level of architectural detailing as the historic structure it is attached to, these differences are due primarily to changes in architectural style and building methods. The designation of the 1910 Building, as a City of Seattle Landmark, will require additional review of the proposed addition to ensure its compatibility to the Landmark.

While the size and height of the building is greater than what was initially reviewed and adopted in the Master Plan, the proposed development is within the 105 foot height limit as required in the underlying Major Institution overlay (MIO) and related zoning. Also noteworthy in this

analysis are the grade changes attributable to this site and the surrounding area. The height of the building appears to be greater due to grade changes from north to south in the general area. From properties to the east, this grade change increases the perceived height of the project. Finally, the underlying height limits established in the MIMP anticipates issues with Height Bulk and Scale with surrounding neighborhoods to the east, which will have the greatest visibility of the project, by designating a transitional 37 foot height limit on the east. This transitional height limit provides a stepping down of anticipated bulk and scale between the proposed addition and the adjacent single family zone approximately 200 feet away.

Accordingly, no conditioning for impacts under SMC 25.05.675G is warranted.

Cultural/Historic Resources

As part of this review, the proposal required review by the Department of Neighborhoods as the project involved the demolition of buildings more than 50 years old. This review is required under compliance with SEPA policies in SMC 25.05.675H. The City's Landmark Preservation Board reviewed the project and determined that part of the project was eligible for designation as a City of Seattle Landmark. The 1910 Building, along with the 1920's era addition for the solaria, was designated as a City of Seattle Landmark. As a result of its nomination and designation, no other review of the site for the purposes of determining if a Landmark building is on the site is warranted.

Noise

As part of the underlying FEIS review, an analysis of Noise that would be generated by projects after construction was conducted. This analysis included a generalized overview of noise generating activities and uses associated with projects and a list of mitigation for projects, including directing noise generating devices away from adjacent uses, design features or other solutions to control, impacts of noise on adjacent properties. As the subject project was not specifically analyzed in the FEIS, and due to the additional scale and size of the project, additional review is warranted under SEPA authority in SMC 25.05.675L

The proposed addition is in a MIO and includes an underlying residential L3 zoning. In addition, adjacent properties are also zoned L3 as well as SF 5000. Accordingly, noise that is generated by the project during operation is limited to noise both produced and received in a residential zone under Noise Ordinance requirements detailed in SMC 25.08. As part of the review of potential noise and possible mitigating efforts, existing noise was documented at 5 locations around the project site within the adjacent residential zones. Also included in the analysis was a detailing of individual types of equipment needed for the project, including HVAC and other types of equipment for the facility, to be located on the rooftop of the building.

While it is anticipated that the proposed equipment will be within noise limits established under the Noise Ordinance during the daytime, the reduced noise levels required for projects in the evening may result in the project being out of compliance. Accordingly, it is proposed that noise barriers and general screening of rooftop equipment will be installed to help mitigate the noise generated by rooftop equipment. In addition, limiting the use of rooftop equipment during

reduced noise hours has been proposed. These two mitigating features will result in reducing the daytime and nighttime noise generated by the rooftop equipment to levels within code requirements in SMC 25.08. Accordingly, no further review or mitigation is required.

Light and Glare

As part of the underlying FEIS review, an analysis of Light, Glare and Shadow was conducted. This analysis included an overview of shadows that were caused by projects with 'significant height and bulk" on surrounding neighborhoods. As the subject project was not specifically analyzed in the FEIS, and due to the additional height and bulk of the project, additional review is warranted under SEPA authority in SMC 25.05.675K

Shadow studies of the project were provided that document both existing and proposed conditions at peak hourly intervals at summer and winter solstices and Spring/Fall equinox. In these analyses, the analysis shows that during the Summer Solstice, past 6:00 pm at night, the proposed project will alter shadows on adjacent properties outside of the MIO. Specifically, the proposed building will shadow the rear yard of two houses that were not shadowed by the existing building at this interval while decreasing the shadow at one house. For properties within the MIO, it appears that a potential increase in shadowing will occur, particularly on properties across 18th Ave from the subject site.

Accordingly, as the scale of the impact in not significant no conditioning or further analysis is warranted.

Transportation, Circulation and Parking

The Final EIS provided an analysis of transportation and traffic related impacts associated with the development of the Major Institution Master Plan. The transportation and traffic analyses in the FEIS evaluated both existing conditions at the time of the report as well as future conditions with the development of all proposed buildings identified in the MIMP. However, due to the proposed development, the nature of the traffic and transportation issues associated with the users of the proposed building and the overall development on the campus, additional review is warranted.

The project site is bounded by 18th Ave to the east, mid block between E. Cherry and E Jefferson Streets. The development is not proposed to have any new parking spaces, as the Major Institution Master Plan, or MIMP, requires the campus to have a minimum and maximum range of parking spaces to serve the development. The MIMP initially anticipated a 60,000 sq ft building at the site. As part of that original proposal, it was anticipated that the proposed Skilled Nursing Facility would have generated approximately 629 daily trips and 91 pm peak hour trips. The nature of the trips that were anticipated for the site for the Skilled Nursing Facility were likely to produce a large number of short term trips to the facility by patients and family members.

The proposed project under this review is for a 158,000 sq foot facility to house medical research offices with accessory administrative office functions. As analyzed in the EIS addendum, it is

estimated that the proposed use would generate approximately 264 daily trips at 82 pm peak trips. The difference in the frequency and duration of trips is likely due to the change of use to accommodate functions that are most closely associated with commuter traffic patterns for office and laboratory workers.

Further noteworthy in this analysis is the overall amount of traffic being generated at the campus. As initially anticipated in the MIMP, the amount of traffic generated by the overall campus was anticipated to be approximately 10,080 daily trips by 2002 with approximately 1,645 pm peak trips. For the purposes of the current project, a trip generation summary for 2004 conditions was developed to document existing conditions to compare against those modeled as part of the underlying EIS for the MIMP. Currently, there are approximately 1,097 pm peak trips being generated by the overall campus. Using traffic numbers that are likely to be generated by the proposed project, it appears that the amount of traffic, coupled with current conditions, indicate that the project will remain within the forecasted trips under the EIS.

Parking for the project is determined by the amount of parking that is available on the entire campus, following an evaluation of both long and short term parking based on minimum parking rates. In the 1994 FEIS, the allowed parking on campus ranged between a minimum of 1152 spaces, with a maximum allowed at 1,555. This rate was based upon minimum parking requirements for employees, patients and visitors. At that time, the available supply indicated that 1,031 parking spaces were located on the campus, indicating that a parking deficit existed on the campus. Such a deficit can result in the likelihood of spillover parking in surrounding neighborhoods. Accordingly, additional parking on the campus was required to address existing conditions and to anticipate the future growth of the campus based upon Master Plan forecast of new square footage.

The MIMP anticipated that by 2002, a range of parking spaces, based upon the factors listed above, would be needed between 1,481 and 1,999 spaces. Accordingly, a supply was anticipated at 1,827 spaces needed to accommodate future development. However, the anticipated growth of the campus has not occurred. For the purpose of this project, an evaluation of minimum and maximum parking range was performed, which included projections based upon the proposed project. A range of minimum and maximum parking requirements was established between 905 and 1,222 parking spaces. Currently, there are 999 parking spaces on site. Accordingly, no additional parking capacity is required due to this project, based on this analysis.

As part of the 1994 MIMP approval, Providence was required to develop and maintain a Transportation Management Plan (TMP). As a TMP goal, Providence is required to meet and maintain a 50% maximum single occupancy vehicle (SOV) rate, excluding employees whose work requires the use of a private automobile. This TMP was designed to ensure that the number of trips, including PM peak trips, as well as available parking, are within acceptable limits as analyzed in the FEIS. To accomplish this goal the existing TMP includes a number of incentives to ensure maximum participation, including:

- Establishing a Transportation Coordination to promote and maintain the program, including annual evaluations
- Preparation of an annual survey

- Provision of discounted transit passes
- Maintenance of parking areas
- Charging for SOV parking
- Maintain and promote HOV programs, with up to 157 spaces at a discounted cost

Accordingly, due to the number of trips likely generated by the project, the current and likely number of pm peak trips, the availability of on-site parking and existing TMP to reduce the number of trips to the site, no further conditioning or analysis is warranted.

DECISION – SEPA

The application is **Approved**.

SEPA - CONDITIONS

The owner(s) and/or responsible party(s) shall:

Prior to Issuance of Master Use Permit and for the Life of the Project

1. Prepare construction phase transportation plan to be reviewed by the Land Use Planner with input from SDOT. Plans shall document the following elements:

    - Location of ingress/egress for construction equipment and trucks;
    - Limiting trips by earth-moving equipment to the hours prior to 3:00 p.m. and after 6:00 p.m.;
    - Truck access routes, to and from the site, for the excavation and construction phases; and
    - Street and sidewalk closures.

During Construction

1. All construction activities shall be limited to non-holiday weekdays between 7:30 a.m. and 6:00 p.m. In addition to the Noise Ordinance requirements, to reduce the noise impact of construction on nearby residences, only low noise impact work such as that listed below, shall be permitted on Saturdays from 9:00 a.m. to 5:00 p.m. and on Sundays from 10:00 a.m. to 5:00 p.m.:

    - Surveying and layout;

    - Other ancillary tasks to construction activities will include site security, surveillance, monitoring, and maintenance of weather protecting, water dams and heating equipment.

After each floor of the building is enclosed with exterior walls and windows, interior construction on the individual enclosed floors can be done at other times in accordance with the

Noise Ordinance. Such construction activities will have a minimal impact on adjacent uses. Restricting the ability to conduct these tasks would extend the construction schedule, thus the duration of associated noise impacts. DCLU recognizes that there may be occasions when critical construction activities could be performed in the evenings and on weekends, which are of an emergency nature or related to issues of safety, or which could substantially shorten the total construction time frame if conducted during these hours.

2. Implement the measures in Construction Phase Transportation Plan approved by DCLU and Seattle Department of Transportation (SDOT).

3. Provide offstreet parking for construction workers. Parking may be provided either on-site, if phasing allows, or off-site with workers shuttled to the site if more than 800 feet from the site.

Signature: (signature on file) Date: June 12, 2003
Michael Jenkins, Land Use Planner
Department of Design Construction and Land Use
Land Use Services

MJ:bg

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